

232071

Richland County Government

County Administration Building
2020 Hampton Street
P.O. Box 192
Columbia, SC 29202



Phone: (803) 576-2050
Fax: (803) 576-2137
TDD: (803) 748-4999

Office of the County Administrator

September 7, 2011



The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

RE: South Carolina Electric & Gas Company-Application for a Certificate
of Environmental Compatibility and Public Convenience and Necessity
Docket No. 2011-325-E

Dear Ms. Boyd:

Enclosed please find for a filing an original and 10 copies of the Petition to
Intervene of Richland County, South Carolina in the above specified matter. By copy of
this letter, I am serving all parties of record.

Please contact me should you have any questions concerning this matter.

Sincerely,


J. Milton Pope
County Administrator

Enclosure

cc: Richland County Council
Larry Smith, County Attorney

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2011-325-E**

IN THE MATTER OF:

**South Carolina Electric & Gas Company)
Application for a Certificate)
of Environmental Compatibility)
and Public Convenience and Necessity)**

PETITION TO INTERVENE

Richland County, South Carolina hereby petitions the Public Service Commission of South Carolina ("Commission") to intervene and be made a party of record in the above captioned docket. In support of the petition, Richland County states the following grounds in support of its petition:

1. Richland County is a unit of local government and is responsible for administering the programs, ordinances and regulations to which is empowered under the laws of South Carolina.
2. Richland County is solely responsible for environmental protection and land use planning and development decisions within non-incorporated areas of the County and cannot be adequately represented by any other party to this proceeding.
3. Richland County alleges that SCE&G based its analysis on incorrect County planning data and failed to incorporate the corrected data in its application filed with the Commission. Richland County's request to intervene is required to assure the Commission's decision on the proposed transmission line is based on factual data and sound analysis and will conform to Richland County's programs, ordinances and regulations.
4. However, at this stage of the proceeding, Richland County lacks sufficient information to fully develop and state its position in this proceeding at this time.
5. Granting Richland County's request to intervene is in the public interest, and consistent with the policies of the Commission in encouraging maximum public participation, and should be allowed to fully address the concerns of Richland County and its citizens.
6. Richland County's mailing address is:

J. Milton Pope, County Administrator
2020 Hampton Street – Suite 4069
Columbia, SC 29204

WHEREFORE, for the reasons set forth above, Richland County respectfully requests permission to intervene in this proceeding.

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2011-325-E**

IN THE MATTER OF:

**South Carolina Electric & Gas Company)
Application for a Certificate)
of Environmental Compatibility)
and Public Convenience and Necessity)**

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day a copy of the **PETITION TO INTERVENE OF RICHLAND COUNTY** via hand delivery to the persons named below at the addresses set forth.

*Representing South Carolina
Department of Health and
Environmental Control (by statute)*
Carlisle Roberts
South Carolina Department of
Health and Environmental Control
(by statute)
Title: Counsel

Legal Department
2600 Bull Street
Columbia, SC 29201

Phone: 803-898-3350
Fax:
robertc@dhec.sc.gov

*Representing South Carolina
Department of Parks, Recreation
and Tourism (by statute)*
Duane Parrish
South Carolina Department of
Parks, Recreation and Tourism
Title: Director

1205 Pendleton Street,
Suite 248
Columbia, SC 29201

Phone: 803-734-0166
Fax: 803-734-1409
dparrish@scprt.com

*Representing Office of Regulatory
Staff*

Jeffrey M. Nelson
Office of Regulatory Staff
Title: Counsel

1401 Main Street, Suite
900
Columbia, SC 29201

Phone: 803-737-0823
Fax: 803-737-0895
jnelson@regstaff.sc.gov

*Representing South Carolina
Department of Natural Resources
(by statute)*

****Mailing Address****
Post Office Box 167
Columbia, SC 29202

Phone: 803-734-4007
Fax:
FramptonJ@dnr.sc.gov

John E. Frampton

South Carolina Department of
Natural Resources (by statute)

Title: Director

*Representing South Carolina
Electric & Gas Company/SCANA
Corporation*

MC C222

Phone: 803-217-8141

220 Operation Way

Fax: 803-217-7810

Cayce, SC 29033-3701

chad.burgess@scana.com

K. Chad Burgess

South Carolina Electric & Gas
Company/SCANA Corporation

Title: Associate General Counsel

*Representing South Carolina
Electric & Gas Company/SCANA
Corporation*

220 Operation Way - MC Phone: 803-217-5359

C222

Fax: 803-217-7931

Cayce, SC 29033-3701

matthew.gissendanner@scana.com

Matthew W. Gissendanner

South Carolina Electric & Gas
Company/SCANA Corporation

Title: Senior Counsel

Intervenors

Office of Regulatory Staff

1401 Main Street, Suite 900
Columbia, SC 29201

Phone: 803-737-0800

Fax: 803-737-0895

South Carolina Department of Health
and Environmental Control (by
statute)

2600 Bull Street
Columbia, SC 29201

Phone:

Fax:

South Carolina Department of Natural
Resources (by statute)

****Street Address****
1000 Assembly Street
Columbia, SC 29201

Phone:

Fax:

South Carolina Department of Parks,
Recreation and Tourism (by statute)

1205 Pendleton Street
Columbia, SC 29201

Phone:

Fax: